

**REMARKS**

Reconsideration of the present application is respectfully requested. Claims 1-26 are currently pending.

In the Office Action it is indicated that the arguments made in response to the previous Office Action have been considered but are moot in view of new grounds of rejection. Claims 1-7, 10-15, and 19-26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,038,313 to Collins ("Collins") in view of U.S. Patent No. 6,373,397 to Song ("Song").

Independent claim 1 is directed to a method of assigning functions to be represented by the keys of a keypad on a cover lid of a mobile communication device including detecting whether the cover lid is in a first position or a second position; assigning, by a control unit, a first set of functions to be represented by the keys when the cover lid is detected in the first position; and assigning, by the control unit, a second set of functions to be represented by the keys when the cover lid is detected in the second position; and wherein the first set of functions and the second set of functions are stored in a key table within a memory.

Regarding independent claim 1, the Office Action has asserted that column 5, lines 20-25 of Collins teaches "a method for assigning functions to be represented by keys on a cover lid of a mobile communication comprising: a switch for recognizing when the cover 16 is open or closed so as to know which functions to assign to the keys, reading on detecting whether the cover lid is in a first position or a second position". The Office Action has further asserted that Collins teaches that "upon detecting the position of the cover lid, a microprocessor, said microprocessor reading on control unit, may assign certain keys the function of a deactivated state, thus reading on assigning, by a control unit, a first set of functions to be represented by the keys when the cover lid is detected in the first position; and assigning, by the control unit, a second set of functions to be represented by the keys when the cover lid is detected in the second position."

The Office Action has acknowledged that Collins does not specifically disclose that "the first set of functions and second set of functions are stored in the microprocessor memory within a key table." The Office Action has asserted that column 6, lines 6-13 of Song teaches "a

telecommunication device wherein, depending upon the position of the flip cover 10, different functions are assigned to the same key member via a key table which is stored within the memory of the CPU 20." The Office Action has further asserted that "it would have been obvious for one of ordinary skill in the art at the time of the invention to combine the teachings of Collins and Song, substituting the CPU 20 having a key/function table, as taught by Song, for the function assigning microprocessor of Collins, as each reference assigns different functions to the keys depending upon the open or closed position of cover lid of the device."

Column 5, lines 20-25 of Collins describes a portable telephone having a hinged flap with a keyboard on each side of the flap. Collins further describes that when the flap is open, the outer keyboard could be deactivated to avoid wrong numbers being dialed if the user inadvertently presses a key on the outer keyboard. The Office Action appears to take the position that deactivation of the keys can be equated with the feature of independent claim 1 of "assigning, by a control unit, a first set of functions to be represented by the keys when the cover lid is detected in the first position." Applicant respectfully disagrees that deactivation of keys can be considered assigning of a set of functions. Applicant respectfully submits that the term function implies that an action is performed, not the lack of performing an action as described by Collins. Thus, Applicant respectfully submits that Collins does not teach or suggest at least the features of independent claim 1 of "assigning, by a control unit, a first set of functions to be represented by the keys when the cover lid is detected in the first position" and "assigning, by the control unit, a second set of functions to be represented by the keys when the cover lid is detected in the second position."

Column 6, lines 6-13 of Song appears to describe a mobile terminal having a flip cover in which when the flip cover is closed and a function selection key is turned on, resistance values corresponding to respective keys of the function selection key are different than when the flip cover is open and the function selection key is not selected. Song further appears to describe a CPU that stores table values corresponding to the respective keys so that an input value from a voltage difference detector is compared with tabled values to recognize the selected function. Applicant respectfully submits that Song does not appear to teach or suggest the aforementioned distinguishing features of independent claim 1 of "assigning, by a control unit, a first set of functions to be represented by the keys when the cover lid is detected in the first position" and

"assigning, by the control unit, a second set of functions to be represented by the keys when the cover lid is detected in the second position." For at least the foregoing reasons, Applicant respectfully submits that independent claim 1 distinguishes over Collins in view of Song and requests that the 35 U.S.C. 103(a) rejection of independent claim 1 be withdrawn.

Independent claim 10 is directed to a mobile communication device having a keypad and keys mounted on a cover lid including a memory unit configured to store a first set of functions and a second set of functions to be represented by the keys in a key table; a detector unit capable of detecting a movement of the cover lid from a first position to a second position; and a control unit connected to the memory unit and the detector unit, the control unit configured to assign the first set of functions to the keys when the cover lid is detected in the first position, and to assign the second set of functions to the keys when the cover lid is detected in the second position. For similar reasons as those discussed with respect to independent claim 1, Applicant respectfully submits that Collins in view of Song fails to teach or suggest at least the features of independent claim 10 of "the control unit configured to assign the first set of functions to the keys when the cover lid is detected in the first position, and to assign the second set of functions to the keys when the cover lid is detected in the second position." Applicant respectfully submits that independent claim 10 distinguishes over Collins in view of Song and requests that the 35 U.S.C. 103(a) rejection of independent claim 10 be withdrawn.

Independent claim 19 is directed to a keypad for a mobile communication device including a plurality of mechanical keys mounted on the keypad and capable of performing a first set of functions and a second set of functions; the plurality of mechanical keys configured to perform the first set of functions when a predetermined event has not occurred; and the plurality of mechanical keys configured to perform the second set of functions when the predetermined event has occurred. Independent claim 19 further includes wherein the keypad is adapted to be connected to the mobile device, the mobile device comprising a memory unit configured to store the first set of functions and the second set of in a key table; and a control unit connected to the memory unit, the control unit configured to assign the first set of functions to the plurality of mechanical keys when the predetermined event has not occurred, and to assign the second set of functions to the plurality of mechanical keys when the predetermined event has occurred. For similar reasons as those discussed with respect to independent claim 1, we submit that Collins in

view of Song fails to teach or suggest at least the features of independent claim 19 of "a control unit connected to the memory unit, the control unit configured to assign the first set of functions to the plurality of mechanical keys when the predetermined event has not occurred, and to assign the second set of functions to the plurality of mechanical keys when the predetermined event has occurred." Applicant respectfully submits that independent claim 19 distinguishes over Collins in view of Song and requests that the 35 U.S.C. 103(a) rejection of independent claim 19 be withdrawn.

Claims 2-7, 11-15, and 20-26 are dependent upon and include the features of independent claims 1, 10, and 19, respectively. For at least the reasons discussed with respect to independent claims 1, 10, and 19, Applicant respectfully submits that claims 2-7, 11-15, and 20-26 also distinguish over Collins in view of Song and requests that the 35 U.S.C. 103(a) rejections of claims 2-7, 11-15, and 20-26 be withdrawn.

Claims 8, 9, and 16-18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Collins in view of Song, as applied to claims 7 and 10, and further in view of U.S. Patent No. 5,987,310 to Gray ("Gray"). The Office Action has acknowledged that Collins does not clearly teach forming raised/tactile or Braille characters on the surface of keys. The Office Action has asserted that column 3, lines 7-8 of Gray teaches that it is desirable to provide a Braille keypad in a cellular phone device.

Claims 8-9 and 16-18 are dependent upon and include the features of independent claims 1 and 10, respectively. As discussed with respect to independent claims 1 and 10, Collins in view of Song fails to teach or suggest the aforementioned distinguishing features of independent claims 1 and 10. Gray describes a cellular phone in the form of a glove with a cellular phone incorporated therein. Column 3, lines 7-8 of Gray describes that the cellular phone may have a Braille key pad. Applicant respectfully submits that Gray also fails to teach or suggest that aforementioned distinguishing features of independent claims 1 and 10. Applicant respectfully submits that claims 8-9 and 16-18 distinguish over Collins in view of Song, and further in view of Gray and requests that the 35 U.S.C. 103(a) rejections of claims 8-9 and 16-18 be withdrawn.

Application No. 09/976834  
Amendment dated August 16, 2005  
After Final Office Action of May 26, 2005

Docket No.: 34649-00462USPT

In view of the foregoing, Applicant believes the pending application is in condition for allowance and such a notice is respectfully requested.

Dated: August 16, 2005

Respectfully submitted,

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